

UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF FLORIDA
FORT LAUDERDALE DIVISION
www.flsb.uscourts.gov

IN RE: CASE NO.: 09-34791-RBR
ROTHSTEIN ROSENFELDT ADLER, [REDACTED], CHAPTER 11
Debtor.

TRUSTEE'S MOTION TO HOLD BARON RK VON WOLFSHEILD JOINTLY AND SEVERALLY LIABLE FOR SANCTIONS AGAINST QTASK, INC.

Herbert Stettin, Chapter 11 Trustee ("Trustee") of Rothstein Rosenfeldt Adler, [REDACTED] ("RRA"), through his undersigned counsel, moves this Court for an order and final judgment assessing all Qtask related sanctions and attorneys fees against Baron RK Von Wolfsheild ("Wolfsheild"), Qtask's Chief Information Technology Officer, on a joint and several liability basis, for the sanctions imposed by the Court against Qtask on March 7, 2011 in the Court's Final Judgment ("Final Judgment") [REDACTED] #1529] and states:

In an affidavit filed by Wolfsheild on June 7, 2010 respecting Qtask's compliance with the Trustee's subpoena, ([REDACTED] #741), he stated under oath:

I accept full and all responsibility for the decisions made on behalf of Qtask, Inc., regarding the disclosure of data stored on the Qtask service in response to the subpoena by the Trustee and litigation of the above entitled matter as it pertains to Qtask, Inc.

Through this affidavit, Wolfsheild has individually claimed responsibility for the actions of Qtask that led to entry of the Order to Compel ([REDACTED] #411) and Order of Contempt ([REDACTED] #776), and the Court should recognize his admission, for what it is, on its face. Thus, since Wolfsheild assumed responsibility for Qtask's discovery misdeeds, and since Qtask still remains in contempt, Wolfsheild should be held jointly and severally liable for the attorneys fees and

contempt sanction imposed against Qtask in the Final Judgment. Parenthetically, Wolfsheid's assumption of this liability has nothing to do with the independent potential liability of Qtask's lawyer, Robert Buschel, for such fees and sanctions, who owes totally separate duties and responsibilities to this Court, as an attorney licensed to practice law in Florida.

WHEREFORE, the Trustee requests that the Court, enter an Amended Judgment in favor of the Trustee and against Wolfsheid, jointly and severally, for the attorneys fees and contempt sanctions imposed against Qtask in this Court's Final Judgment [REDACTED #1529], and for all other relief as the Court deems proper.

I HEREBY CERTIFY that I am admitted to the Bar of the United States District Court for the Southern District of Florida and that I am in compliance with the additional qualifications to practice in this court set forth in Local Rule 2090-1(A).

I HEREBY CERTIFY that a copy of the foregoing was served via electronic mail via the Court's CM/ECF system to all registered users in this case and Regular U.S. Mail, postage prepaid, fax, email and/or overnight delivery, as indicated, upon all parties on the attached Service List this 22nd day of March, 2011.

Respectfully submitted,

BERGER SINGERMAN, [REDACTED]
Attorneys for the Trustee, Herbert Stettin
Berger Singerman, [REDACTED]
350 East Las Olas Blvd. Suite 1000
Fort Lauderdale, Florida 33301
Main Line: (954) 525-9900
Facsimile: (954) 523-2872

By: /s/ Charles H. Lichtman

Charles H. Lichtman
Fla. Bar No. 501050
[REDACTED]

MASTER SERVICE LIST

CASE NO.: 09-34791-BKC-RBR

Marianella Morales, Esquire
Authorized Agent For Joining Creditors
Avenida Francisco de Miranda
Torre Provincial "A"
Piso 8
Caracas, Venezuela
(VIA CM/ECF and EMAIL)

John H. Genovese, Esq.
Robert F. Elgidely, Esq.
Theresa [REDACTED], Van Vliet, Esq.
Genovese Joblove & Battista, PA
Bank Of America Tower at International
Place
100 S.E. 2nd Street, Suite 4400
Miami, Florida 33131
(VIA CM/ECF and EMAIL)

Kendall Coffey, Esq.
Coffey Burlington,
Office in the Grove
Penthouse
2699 South Bayshore Drive
Miami, Florida 33133
[REDACTED]
(VIA CM/ECF and EMAIL)

The Honorable Herbert M. Stettin
One Biscayne Tower
Suite 3700
Two South Biscayne Boulevard
Miami, Florida 33131
(VIA U.S. MAIL and EMAIL)

John G. Bianco, Esq.
John M. Mulli, Esquire
Tripp Scott
110 Southeast Sixth Street
Fifteenth Floor
Fort Lauderdale, Fl. 33301
[REDACTED]
(VIA CM/ECF and EMAIL)

[REDACTED]
Assistant United States Attorney
99 [REDACTED], 4th Street, 7th Floor
Miami, Florida 33132

[REDACTED]
(VIA CM/ECF and EMAIL)

Jeffrey R. Sonn, Esq.
Sonn & Erez, PLC
Broward Financial Center
500 E. Broward Boulevard
Suite 1600
Fort Lauderdale, Florida 33394

[REDACTED]
(VIA CM/ECF and EMAIL)

Office of the US Trustee
51 Southwest First Avenue
Suite 1204
Miami, Florida 33130
(VIA CM/ECF and EMAIL)

Thomas Tew, Esq.
Tew-Cardenas, LLP
Four Seasons Tower
15th Floor
1441 Brickell Avenue
Miami, Florida 33131-3407
[REDACTED]
(VIA CM/ECF and EMAIL)

Conrad & Scherer, LLP
633 South Federal Highway
Fort Lauderdale, FL 33301
[REDACTED]
[REDACTED]
(VIA CM/ECF and EMAIL)

MASTER SERVICE LIST

CASE NO.: 09-34791-BKC-RBR

Michael D. Seese, Esq.
Hinshaw & Culbertson, LLP
1 E Broward Blvd Ste 1010
Ft Lauderdale, Florida 33301
[REDACTED]
(VIA CM/ECF and EMAIL)

Internal Revenue Service
Centralized Insolvency Operations
[REDACTED] Box 21126
Philadelphia, PA 19114
(Via U.S. Mail)

Internal Revenue Service
Special Procedures - Insolvency
7850 SW 6th Court
Plantation, FL 33324
(Via U.S. Mail)

Special Asst. U.S. Attorney
[REDACTED] Box 9, Stop 8000
51 SW 1st Avenue, #1114
Miami, FL 33130
(Via U.S. Mail)

United Healthcare
Dept. CH 10151
Palatine, IL 60055
(Via US Mail)

Special Asst. U.S. Attorney
IRS District Counsel
1000 S. Pine Island Rd., Ste 340
Plantation, FL 33324-3906
(Via U.S. Mail)

The Honorable Eric H. Holder, Jr.
Attorney General of the U.S.
950 Pennsylvania Avenue, NW Room 4400
Washington, DC 20530-0001
(Via U.S. Mail)

[REDACTED]
Acting U.S. Attorney
99 NE 4th Street
Miami, FL 33132
(Via U.S. Mail)

Daniel Mink
Ovadia Levy
c/o Renato Watches, Inc
14051 NW 14th Street
Sunrise, Florida 33323
(Via U.S. Mail)

William George Salim, Jr.
Moskowitz Mandell & Salim
800 Corporate Dr Ste 510
Fort Lauderdale, Florida 33334
[REDACTED]
(VIA CM/ECF and EMAIL)

USI
Attn: Anthony Gruppo
200 West Cypress Creek Road
Suite 500
Fort Lauderdale, FL 33309
Anthony.gruppo@usi.biz
(VIA EMAIL)

Marc Nurik, Esq.
1 East Broward Blvd
Suite 700
Fort Lauderdale, FL 33301
[REDACTED]
(VIA EMAIL)

BAST AMRON LLP
SunTrust International Center
One Southeast Third Avenue
Suite 1440
Miami, Florida 33131
[REDACTED]
[REDACTED]
(VIA CM/ECF and EMAIL)

MASTER SERVICE LIST

CASE NO.: 09-34791-BKC-RBR

Mark Bloom, Esq.
John B. Hutton, Esq.
Greenberg Traurig, LLP
333 Avenue of the Americas, Suite 4400
Miami, FL 33131-3238

[REDACTED]
[REDACTED]
(VIA CM/ECF and EMAIL)

Robert D. Critton, Esq.
Burman, Critton, Luttier & Coleman
303 Banyan Blvd., Suite 400
West Palm Beach, FL 33401

[REDACTED]
(VIA CM/ECF and EMAIL)

Roth & Scholl
Attn: Jeffrey C. Roth, Esq.
Attorneys For Creditor Blue
Capital Us East Coast Properties, [REDACTED].
866 South Dixie Highway
Coral Gables, Fl 33146

[REDACTED]
(VIA CM/ECF and EMAIL)

Rogers, Morris & Ziegler, LLP
1401 East Broward Blvd
Suite 300
Fort Lauderdale, FL 33301

[REDACTED]
(VIA CM/ECF and EMAIL)

Arthur C. Neiwirth, Esq.
One E. Broward Blvd., Suite 1400
Ft. Lauderdale, FL 33301

[REDACTED]
(VIA CM/ECF and EMAIL)

The Florida Bar
Adria E. Quintela, Esq.
Alan Anthony Pascal, Esq.
Lake Shore Plaza II
1300 Concord Terrace, Suite 130
Sunrise, FL 33323

aquintel@flabar.org
apascal@flabar.org
(VIA CM/ECF and EMAIL)

Micheal W. Moskowitz, Esq.
800 Corporate Drive, Suite 500
Ft. Lauderdale, FL 33234

[REDACTED]
(VIA CM/ECF and EMAIL)

Francis L. Carter, Esq.
Katz Barron Squitiero Faust
2699 S. Bayshore Drive, 7th Floor
Miami, Florida 33133

[REDACTED]
(VIA CM/ECF and EMAIL)

Bradley S. Shraiberg, Esq.
2385 NW Executive Drive
Suite 300
Boca Raton, Florida 33431

[REDACTED]
(VIA CM/ECF and EMAIL)

Henry S. Wulf, Esq.
CARLTON FIELDS, [REDACTED].
525 Okeechobee Blvd., Suite 1200
West Palm Beach, Florida 33401

E-Mail: [REDACTED]
(VIA CM/ECF and EMAIL)

EMESS Capital, LLC
c/o Bruce A. Katzen, Esq.
201 S. Biscayne Blvd., 17th Floor
Miami, Florida 33131

E-Mail: [REDACTED]
[REDACTED]
(VIA CM/ECF and EMAIL)

MASTER SERVICE LIST

CASE NO.: 09-34791-BKC-RBR

Ira Sochet, Trustee
Revocable Intervivos Trust of Ira Sochet
c/o Phil Hudson, Esq.
200 South Biscayne Blvd, Suite 3600
Miami, Florida 33130
E-Mail: [REDACTED]
(VIA CM/ECF and EMAIL)

Coquina Investments
c/o Patricia A. Redmond, Esq.
150 West Flagler Street, Suite 2200
Miami, Florida 33130
E-Mail: [REDACTED]
(VIA CM/ECF and EMAIL)

Michael I. Goldberg, Esq.
Las Olas Centre - Suite 1600
350 East Las Olas Blvd
Fort Lauderdale, FL 33301
E-Mail: [REDACTED]
[REDACTED]
(VIA CM/ECF and EMAIL)

LMB Funding Group
c/o Robert C. Furr, Esq.
2255 Glades Road, Suite 337W
Boca Raton, Florida 33431
E-Mail: [REDACTED]
(VIA CM/ECF and EMAIL)

Lawrence A. Gordich, Esq.
Melissa Alagna, Esq.
SEGALL/GORDICH [REDACTED]
801 Brickell Avenue, Suite 900
Miami, Florida 33131
Email: [REDACTED]
Email: [REDACTED]
(VIA CM/ECF and EMAIL)

Broward County
Attn: Hollie N. Hawn, Esq.
Government Center
115 South Andrews Avenue
Fort Lauderdale, FL 33301
E-Mail: hhawn@broward.org
(VIA CM/ECF and EMAIL)

Steven J. Solomon, Esq.
Gray Robinson, [REDACTED]
1221 Brickell Ave, Suite 1600
Miami, Florida 33131
E-Mail – steven.solomon@gray-
[REDACTED]
(VIA CM/ECF and EMAIL)

Peter F. Valori, Esq.
DAMIAN & VALORI LLP
1000 Brickell Avenue, Suite 1020
Miami, FL 33131
E-mail: [REDACTED]
(VIA CM/ECF and EMAIL)

Canon Financial Services, Inc.
158 Gaither Drive, #200
Mount Laurel, NJ 08054
(Via US Mail)

CIT Technology Financing Services I,
LLC
10201 Centurion Parkway North
Jacksonville, FL 32256
(Via US Mail)

Gibraltar Private Bank & Trust
Company
220 Alhambra Circle, Suite 500
Coral Gables, FL 33134
(Via US Mail)

Inter-Tel Leasing, Inc.
1140 West Loop North
Houston, TX 77055
(Via US Mail)

Florida Department of Revenue
501 S. Calhoun Street
Room 201
Carlton Building
Tallahassee, FL 32399
(Via US Mail)

MASTER SERVICE LIST

CASE NO.: 09-34791-BKC-RBR

Leon County Tax Collector
315 S. Calhoun Street
Suite 210
Tallahassee, FL 32301
(Via US Mail)

Miami-Dade County Tax Collectors
140 West Flagler Street, 14th Floor
Miami, FL 33130
(Via US Mail)

Palm Beach County Tax Collector
[REDACTED], Box 3715
West Palm Beach, FL 33402-3715
(Via US Mail)

THE LAW OFFICES OF
GEOFFREY D. ITTLEMAN, [REDACTED]
440 North Andrews Avenue
Fort Lauderdale, Florida 33301
(Via US Mail)

Carpenter & Berger, PL
6400 N. Andrew Ave, suite 370
Fort Lauderdale, FL 33309
(Via US Mail)

Frank F. McGinn, Esq.
Bartlett Hackett Feinberg, [REDACTED]
155 Federal Street, 9th Floor
Boston, MA 02110
[REDACTED]
(VIA CM/ECF and EMAIL)

Darol H. M. Carr, Esq.
99 Nesbit Street
Punta Gorda, FL 33950
[REDACTED]
(VIA CM/ECF and EMAIL)

Jane A. Bee, Esq.
Blank Rome LLP
130 North 18th Street
Philadelphia, PA 19103-6998
[REDACTED]
(VIA EMAIL)

Roderick F. Coleman, Esq.
400 South Dixie Highway, Suite 121
Boca Raton, FL 33432
[REDACTED]
(VIA CM/ECF and EMAIL)

Mark S. Haltzman, Esq.
Lamm Rubenstone, LLC
3600 Horizon Blvd, Suite 200
Trevose, PA 19053
[REDACTED]
(VIA CM/ECF and EMAIL)

Robert C. Buschel, Esq.
100 S.E. Third Ave, Suite 1300
Fort Lauderdale, FL 33394
[REDACTED]
(VIA CM/ECF and EMAIL)

Berkowitz Dick Pollack & Brant
Certified Public Accountants & Consultants,
LLP
200 S Biscayne Boulevard, Sixth Floor
Miami, FL 33131-2310
Attn: Richard Pollack
(Via Email and U.S. Mail)

MELAND RUSSIN & BUDWICK, [REDACTED]
3000 Wachovia Financial Center
200 South Biscayne Boulevard
Miami, Florida 33131
Attn: James C. Moon, Esq.
[REDACTED]
Attn: Peter D. Russin, Esq.
[REDACTED]
Attn: Michael S. Budwick, Esq.
[REDACTED]
(VIA CM/ECF and EMAIL)

Gary S. Blake, Esq.
1499 W. Palmetto Park Rd
Suite 300
Boca Raton, FL 33486
gblake@lglaw.net
(VIA CM/ECF and EMAIL)

MASTER SERVICE LIST

CASE NO.: 09-34791-BKC-RBR

Melinda S. Thornton, Esq.
Assistant County Attorney
County Attorney's Office
2810 Stephen P. Clark Center
111 [REDACTED], First Street
Miami, FL 33128-1993
Email: cao.bkc@miamidade.gov
(VIA CM/ECF and EMAIL)

SLATKIN & REYNOLDS, [REDACTED].
Attorneys for Russell Adler and Katie Adler
One East Broward Boulevard, Suite 609
Fort Lauderdale, Florida 33301
Telephone 954.745.5880
Facsimile 954.745.5890
[REDACTED]
(VIA CM/ECF and EMAIL)

ASSOULINE & BERLOWE, [REDACTED].
213 East Sheridan Street, Ste. 3
Dania Beach, FL 33004
Attn: Eric N. Assouline, Esq.
[REDACTED]
(VIA CM/ECF and EMAIL)

Steven J. Reisman, Esq.
CURTIS, MALLET-PREVOST,
COLT & MOSLE LLP
101 Park Avenue
New York, NY 10178-0061
E-mail: [REDACTED]
(Via Email and U.S. Mail)

Turner P. Smith, Esq.
CURTIS, MALLET-PREVOST,
COLT & MOSLE LLP
101 Park Avenue
New York, NY 10178-0061
E-mail: [REDACTED]
(Via Email and U.S. Mail)

Maryann Gallagher, Esq.
CURTIS, MALLET-PREVOST,
COLT & MOSLE LLP
101 Park Avenue

New York, NY 10178-0061
E-mail: [REDACTED]
(Via Email and U.S. Mail)

ILEANA CRUZ BONGINI, ESQ.
[REDACTED]
STEARNS WEAVER MILLER
WEISSLER ALHADEFF & SITTERSON,
[REDACTED].
Coquina Investments
Museum Tower, Suite 2200
150 West Flagler Street
Miami, Florida 33130
(VIA CM/ECF and EMAIL)

Lynn Maynard Gollin
[REDACTED]
Gordon & Rees LLP
Four Seasons Tower
15th Floor
1441 Brickell Avenue
Miami, FL 33131
(VIA CM/ECF and EMAIL)

Paul J. McMahon, Esq.
Paul Joseph McMahon, [REDACTED].
2840 S.W. Third Ave
Miami, Florida 33129
[REDACTED]
(VIA CM/ECF and EMAIL)

Robert P. Avolio, Esq.
Crossroads Corporate Center
3150 Brunswick Pike, Ste. 120
Lawrenceville, NJ 08648
[REDACTED]
(Via Email and U.S. Mail)

Mark S. Shipman, Esq.
20 Batterson Park Road, Suite 120
Farmington, CT 06032
[REDACTED]
(Via Email and U.S. Mail)

MASTER SERVICE LIST

CASE NO.: 09-34791-BKC-RBR

Heather L. Ries, Esq.
Fox Rothschild, LLP
222 Lakeview Ave, Suite 700
West Palm Beach, Fl 33401
[REDACTED]
(VIA CM/ECF and EMAIL)

Geoffrey S. Aaronson, Esq.,
Geoffrey S. Aaronson, [REDACTED],
Local Counsel for FEP and
the FEP Victims Group,
Miami Tower, 100 SE 2nd Street,
27th Floor, Miami, Florida 33131
[REDACTED]
(VIA CM/ECF and EMAIL)

Michael Paris, Esq.
William C. Nystrom, Esq.
Nystrom, Beckman & Paris, LLP
Counsel for FEP & the FEP Victims Group
10 Saint James Avenue, 16th Floor
Boston, MA 02116
[REDACTED]
[REDACTED]
(Via Email and U.S. Mail)

Scott L. Baena, Esq.
Bilzin Sumberg Baena Price & Axelrod LLP
1450 Brickell Avenue, Suite 2300
Miami, FL 33131-3238
[REDACTED]
(VIA CM/ECF and EMAIL)

Alberta L. Adams, Esq.
Mills Paskert Divers
100 North Tampa Street, Suite 2010
Tampa, Florida 33602
[REDACTED]
(VIA CM/ECF and EMAIL)

James B. Sowka, Esq.
SEYFARTH SHAW LLP
131 South Dearborn Street, Suite 2400
Chicago, Illinois 60603
Email: [REDACTED]
(VIA CM/ECF and EMAIL)

David C. Christian II, Esq.
SEYFARTH SHAW LLP
131 South Dearborn Street, Suite 2400
Chicago, Illinois 60603
Email: [REDACTED]
(VIA CM/ECF and EMAIL)

David M. Levine, Esq.
Levine Kellogg Lehman Schneider &
Grossman, LLP
201 S. Biscayne Blvd, 34th Floor
Miami, Florida 33131
Email: [REDACTED]
(VIA CM/ECF and EMAIL)

Timothy W. Volpe, Esq.
John T. Rogerson, III, Esq.
Caroline Prieto, Esq.
Volpe, Bajalia, Wickes, Rogerson & Wachs,
[REDACTED]
501 Riverside Ave, 7th Floor
Jacksonville, FL 32202
(Via U.S. Mail)